

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

ADAM GRAD, on Behalf of Himself and All
Others Similarly Situated,

Plaintiff,

v.

IRONNET, INC., KEITH B. ALEXANDER,
JAMES C. GERBER, and WILLIAM E.
WELCH,

Defendants.

Civil Action No. 1:22-cv-00449-RDA-JFA

CLASS ACTION

**NOTICE OF MOTION OF SHIRLEY GUTHRIE,
YONG KIM, AND ROGER CAROWAY FOR APPOINTMENT AS LEAD
PLAINTIFF AND APPROVAL OF SELECTION OF COUNSEL**

PLEASE TAKE NOTICE that pursuant to 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), Shirley Guthrie, Yong Kim, and Roger Caroway (together, “Movants”) hereby move this Court, the Honorable Rossie D. Alston, Jr, United States District Court Judge, for an order:

(a) appointing Movants to serve as Lead Plaintiff in this action; and

(b) approving Movants’ selection of Johnson Fistel, LLP and Robbins Geller Rudman & Dowd LLP as lead counsel and The Office of Craig C. Reilly, Esq. as liaison counsel for the putative class.

In support of this motion, Movants submit: (i) the Memorandum of Law dated June 21, 2022; (ii) the Declaration of Craig C. Reilly in Support of the Motion of Shirley Guthrie, Yong Kim, and Roger Caroway for Appointment as Lead Plaintiff and Approval of Selection of Counsel

(and exhibits attached thereto); and (iii) a [Proposed] Order Appointing Lead Plaintiff and Approving Lead Plaintiff's Selection of Counsel.

This motion is made on the grounds that Movants are the “most adequate plaintiff” pursuant to the PSLRA and should therefore be appointed Lead Plaintiff. Specifically, Movants have the “largest financial interest” in the relief sought by the class in this action as a result of the substantial loss they suffered on their purchases of IronNet, Inc. securities during the Class Period. Movants also otherwise satisfy the requirements of Rule 23 of the Federal Rules of Civil Procedure because their claims are typical of those of other class members and because they will fairly and adequately represent the interests of the class.

DATED: June 21, 2022

THE OFFICE OF CRAIG C. REILLY, ESQ.

/s/ Craig C. Reilly

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Counsel*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 21, 2022, a true and correct copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all CM/ECF participants.

/s/ Craig C. Reilly

CRAIG C. REILLY